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11 *Attorneys for Plaintiff Snap Lock Industries, Inc.*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 **SNAP LOCK INDUSTRIES, INC.,**

15 Plaintiff,

16 vs.

17 **SWISSTRAX CORPORATION,**

18 Defendant.

Case No. 2:17-cv-02742-RFB-BNW

**STIPULATION FOR EXTENSION OF  
CASE MANAGEMENT DEADLINES FOR  
CONDUCTING DEPOSITIONS**

**(SECOND REQUEST)**

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20 Plaintiff Snap Lock Industries, Inc. ("Snap Lock") and Defendant Swisstrax Corporation  
21 ("Swisstrax") (collectively, "Parties"), through their undersigned counsel, hereby stipulate and agree  
22 to extend certain case management deadlines, as set forth more fully below.

23 1. Although the parties scheduled all expert depositions in this case prior to the March 13,  
24 2020, deadline for conducting expert discovery, and completed two expert depositions prior to the  
25 deadline, based on travel restrictions in effect due to the Covid-19 pandemic and the parties' and expert  
26 witnesses' concern regarding travel, the parties agreed to continue the depositions and requested an  
27 additional 45 days to complete expert discovery. *See* ECF No. 152.  
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2. On March 13, 2020, the Court granted the Parties' Stipulation and extended certain case management deadlines, including extending the last day to complete expert discovery to April 27, 2020. *See* ECF No. 153.

3. Unfortunately, since that time, the restrictions and concerns regarding the Covid-19 pandemic have only intensified and the states where the expert witnesses and counsel for the parties reside are all under stay-at-home directives or mandatory stay-at-home orders. In addition, some of the expert witnesses lack technology for video-conferencing, making preparing for and taking remote depositions difficult. Moreover, if certain of the experts are required to travel for depositions, they may be in violation of State executive orders. Due to these restrictions, and the parties' and witnesses' concern regarding the virus, the parties hereby request an additional sixty (60) days to complete expert discovery. The parties are working together to reschedule the four remaining expert depositions within the newly extended expert discovery deadline. The parties also agree to extend the dispositive motion deadline and the date to file the joint pretrial order to maintain the timing of the deadlines following the close of expert discovery. Accordingly, the parties respectfully request that the Court enter an Order regarding case deadlines as follows:

DEADLINE	CURRENT DATE	PROPOSED DATE
Last day to complete expert discovery	April 27, 2020	June 26, 2020
Dispositive motion deadline	May 27, 2020	July 27, 2020
Date to file joint pretrial order	June 29, 2020	August 26, 2020

4. The Parties do not currently have a trial date. Good cause exists for this request. The Parties are not seeking the continuance for purposes of undue delay.

5. Pursuant to the initial Scheduling Order in this case (ECF No. 59), in the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after a decision on the dispositive motions. In addition, the disclosures required by Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the pretrial order (*id.*).

1 Dated this 7th day of April, 2020.

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3 DORSEY & WHITNEY LLP

4 /s/ Tamara L. Kapaloski

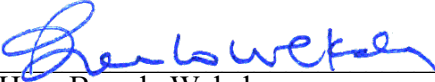
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12 IT IS SO ORDERED:

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15 Hon. Brenda Weksler  
16 United States Magistrate Judge

17 DATED: 4/8/2020  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of April, 2020, the foregoing **STIPULATION FOR  
EXTENSION OF CASE MANAGEMENT DEADLINES FOR CONDUCTING  
DEPOSITIONS** was served to all counsel of record via the Court's CM/ECF system.

/s/ Tamara L. Kapaloski